PB84-211465

Reporting and Recordkeeping Burdens Associated with EPA's Fuel Economy Program

(U.S.) Environmental Protection Agency
Ann Arbor, MI

May 83

U.S. Department of Commerce
National Technical Information Service
NTIS

TECHNICAL REPORT DATA
(Please read Instructions on the reverse before completing)

1. REPORT NO.	2.	3. RECIPIENT'S ACCESSION NO.
EPA-AA-CPSB-83-03		PB84 211465

4. TITLE AND SUBTITLE	5. REPORT DATE
Reporting and Recordkeeping Burdens Associated with EPA's Fuel Economy Program.	May 1983
	6. PERFORMING ORGANIZATION CODE
7. AUTHOR(S)	8. PERFORMING ORGANIZATION REPORT NO.
Clifford D. Tyree	
9. PERFORMING ORGANIZATION NAME AND ADDRESS	10. PROGRAM ELEMENT NO.
U.S. Environmental Protection Agency Office of Mobile Sources Certification Policy and Support Branch Ann Arbor, MI 48105	11. CONTRACT/GRANT NO.
12. SPONSORING AGENCY NAME AND ADDRESS	13. TYPE OF REPORT AND PERIOD COVERED
SAME AS BOX 9	Technical
	14. SPONSORING AGENCY CODE

15. SUPPLEMENTARY NOTES

DISCLAIMER: Portions of this document are illegible.

16. ABSTRACT

This report estimates the reporting and recordingkeeping burdens associated with the Environmental Protection Agency's (EPA) fuel economy program. This assessment was undertaken to fulfill the requirements of the Office of Management and Budget's (OMB) Form SF 83 for the proposed rulemaking entitled "Revisions to Imptove Fuel Economy Labeling and the Fuel Economy Data Base."

17. KEY WORDS AND DOCUMENT ANALYSIS

a. DESCRIPTORS	b. IDENTIFIERS/OPEN ENDED TERMS	c. COSATI Field/Group
Fuel Consumption Motor Vehicles Regulations	Fuel Economy	

18. DISTRIBUTION STATEMENT	19. SECURITY CLASS *(This Report)*	21. NO. OF PAGES
Release Unlimited	unclassified	6
	20. SECURITY CLASS *(This page)*	22. PRICE
	unclassified	

EPA Form 2220-1 (9-73)

EPA-AA-CPSB-83-03

PB84-211465

Technical Report

Reporting and Recordkeeping Burdens Associated with EPA's Fuel Economy Program

Clifford D. Tyree

May 1983

NOTICE

Technical Reports do not necessarily represent final EPA decisions or positions. They are intended to present technical analysis of issues using data which are currently available. The purpose in the release of such reports is to facilitate the exchange of technical information and to inform the public of technical developments which may form the basis for a final EPA decision, position, or regulatory action.

U. S. Environmental Protection Agency
Office of Air, Noise, and Radiation
Office of Mobile Sources
Certification Division
Certification Policy and Support Branch
2565 Plymouth Road
Ann Arbor, Michigan 48105

REPRODUCED BY
NATIONAL TECHNICAL
INFORMATION SERVICE
U. S. DEPARTMENT OF COMMERCE
SPRINGFIELD, VA. 22161

I. Purpose

This report estimates the reporting and recordkeeping burdens associated with the Environmental Protection Agency's (EPA) fuel economy program. This assessment was undertaken to fulfill the requirements of the Office of Management and Budget's (OMB) Form SF 83 for the proposed rulemaking entitled "Revisions to Improve Fuel Economy Labeling and the Fuel Economy Data Base." In particular, this assessment responds to question numbers 17, 18, and 19 of Part III.

II. Background

This report relies upon the information submitted to the OMB in September of 1981 to obtain Clearance No. 2000-0390 which applies to the EPA Motor Vehicle Certification and Fuel Economy Program.[1] The reporting and recordkeeping burdens for the Fuel Economy program are only a part of the materials covered by Clearance No. 2000-0390. This report only discusses the burdens attributable to the Fuel Economy program. The data of the 1981 submission was provided to EPA by eight manufacturers. The manufacturer's estimates were combined to develop composite reporting burden estimates for the entire industry. The resources requirements associated with each particular function are based on the September document because the regulations pertaining to the fuel economy program have not changed since the date of the original submission. The number of test vehicles, labels for a given model year, etc., have changed slightly since the 1981 model year and, appropriate adjustments have been made.

III. Annual Reporting/Recordkeeping Burden

Questions 17 and 18 of Part III deal with the reporting burden and recordkeeping burden respectively. Data submitted by the manufacturers were not of sufficient detail that would allow a meaningful separation of reporting and recordkeeping burdens. Therefore, this assessment will describe the overall reporting/recordkeeping burden.

---

1. "Reporting and Information Collection Burdens Associated with EPA's Motor Vehicle Emission Certification and Fuel Economy Program," September 1981.

The areas associated with recordkeeping and reporting are in 40 CFR Part 600:

1. Vehicle Information Books
2. Labeling Requirements
3. Interior Volume Calculations
4. Relabeling
5. Final CAFE Data

Each of these items is discussed below:

1. The proposed regulation has deleted the requirements for routinely submitting the vehicle data description books. The manufacturers must, however, maintain these data in their files. The resources estimated by the manufacturers for the 1981 model year was 73 hours per vehicle. By eliminating the requirement of submitting actual vehicle books EPA estimates that this resource requirement has been reduced by 40 percent. 1983 model year data indicate that 901 fuel economy data vehicles were actually tested. However, of these 901 vehicles, 300 of the vehicles are unique vehicles. The remaining 601 vehicles are tests conducted on the original 300 vehicles. The information currently submitted on these 601 vehicles is minimal and is estimated to be 10 hours per vehicle. Thus, the resource requirement for vehicle data books is:

(73 hours per vehicle x .6) x 300 vehicles = 13,400 hours
(10 hours per vehicle) x 601 vehicles = 6,010 hours
Total = 19,150 hours

2. The manufacturers estimated that it required 6 hours per label to process the data and submit the required information to EPA. The proposed regulation establishes a standard format which will be adhered to by all manufacturers. The information on the label has been reduced as well as the need to obtain prior EPA approval before using a label. The fuel economy data depicted on the label must still be provided to EPA. EPA estimates the label reporting burden will be reduced from 6 hours per label to 1 hour per label. The 1983 label data base indicates there were 1,915 labels approved for the 1983 model year. The estimated resource burden is:

1,915 labels x 1 hour per label = 1,915 hours

3. The interior volume is calculated for each car line configuration. The changes made in the interior volume calculation methodology have not changed. The composite industry's

estimated resource requirement for this area was 8 hours per car line. For 1983 there were 251 car lines. The resource requirement is:

251 car lines x 8 hours per car line = 2,008 hours

4. The relabeling requirement is a new requirement. EPA has estimated that it will take 1,144 hours to recalculate and update sales projection for the industry.[2]

5. The proposed rules will eliminate the need for preliminary CAFE and will retain only the final CAFE data requirements. EPA estimates that it will take the 7 major manufacturers 4-person weeks to satisfy the recordkeeping reporting burden and the remaining 25 manufacturers 2-person weeks each. The resource requirement is:

(7 x 40 x 4) + (25 x 40 x 2) = 3,120 hours

IV. Summary

The Annual Report/Recordkeeping Burden

Vehicle Information	19,150
Labeling	1,915
Interior Volume Calculations	2,008
Relabeling	1,144
CAFE	3,120
Total	27,337 hours

Question 19 of Part III asks for the difference between the annual burden in the current OMB inventory and the explanation of the difference. The current annual burden is 32,125 hours. The net difference is a decrease of 4,788 hours of annual recordkeeping/reporting burden. This decrease comes about because of the elimination of the preliminary CAFE requirements, reduced vehicle information reporting requirements, and by incorporating a standardized label format.

2. Tyree, C.D., "Cost Analysis of Proposed Changes to 40 CFR Part 600 to Improve Fuel Economy Labeling and the Fuel Economy Data Base," September 1982, EPA Report No. EPA-AA-CPSB-82-03.

IMPORTANT — READ INSTRUCTIONS BEFORE COMPLETING FORM. DO NOT USE THE SAME SF 83 TO SIMULTANEOUSLY REQUEST AN EXECUTIVE ORDER 12291 REVIEW AND APPROVAL UNDER THE PAPERWORK REDUCTION ACT.

ANSWER ALL QUESTIONS IN PART I. IF THIS REQUEST IS FOR REVIEW UNDER E.O. 12291, COMPLETE PART II AND SIGN THE CERTIFICATION. IF THIS REQUEST IS FOR APPROVAL UNDER THE PAPERWORK REDUCTION ACT AND 5 CFR 1320, SKIP PART II, COMPLETE PART III AND SIGN THE CERTIFICATION.

SEND THREE COPIES OF THIS FORM, THE MATERIAL TO BE REVIEWED, AND FOR PAPERWORK -- THREE COPIES OF THE SUPPORTING STATEMENT TO: OFFICE OF INFORMATION AND REGULATORY AFFAIRS, OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, D.C. 20503 -ATTENTION DOCKET LIBRARY ROOM 3201

PART I.

1. DEPARTMENT/AGENCY and BUREAU/OFFICE ORIGINATING REQUEST	2. AGENCY CODE	3. NAME AND TELEPHONE NUMBER OF PERSON WH CAN BEST ANSWER QUESTIONS REGARDING THIS REQUEST
EPA/OANR/Office of Mobile Sources	2060	Cliff Tyree 374-8310

4. TITLE OF INFORMATION COLLECTION OR RULEMAKING

Applications for Motor Vehicle Emission Certification and Fuel Economy Labeling

5. LEGAL AUTHORITY FOR INFORMATION COLLECTION OR RULE (CITE UNITED STATES CODE, PUBLIC LAW, OR EXECUTIVE ORDER)

15 USC 2005, 2006 & 42 USC 7525,7542

6. AFFECTED PUBLIC (CHECK ALL THAT APPLY)

- ☐ 1. INDIVIDUALS OR HOUSEHOLDS
- ☐ 2. STATE OR LOCAL GOVERNMENTS
- ☐ 3. FARMS
- ☒ 4. BUSINESSES OR OTHER FOR-PROFIT
- ☐ 5. FEDERAL AGENCIES OR EMPLOYEES
- ☐ 6. NON-PROFIT INSTITUTIONS
- ☐ 7. SMALL BUSINESSES OR ORGANIZATIONS

PART II. COMPLETE THIS PART ONLY IF THE REQUEST IS FOR OMB REVIEW UNDER EXECUTIVE ORDER 12291.

7. REGULATORY INFORMATION NUMBER (RIN)

8. CFR SECTION AFFECTED

____ CFR _____

8. TYPE OF SUBMISSION

CLASSIFICATION

- ☐ 1. MAJOR
- ☐ 2. NONMAJOR

STAGE OF DEVELOPMENT

- ☐ 1. PROPOSED OR DRAFT
- ☐ 2. FINAL OR INTERIM FINAL, WITH PRIOR PROPOSAL
- ☐ 3. FINAL OR INTERIM FINAL, WITHOUT PRIOR PROPOSAL

TYPE OF REVIEW REQUESTED

- ☐ 1. STANDARD
- ☐ 2. PENDING
- ☐ 3. EMERGENCY
- ☐ 4. STATUTORY OR JUDICIAL DECREE

10. DOES THIS REGULATION CONTAIN REPORTING OR RECORD-KEEPING REQUIREMENTS THAT REQUIRE OMB APPROVAL UNDER THE PAPERWORK REDUCTION ACT AND 5 CFR 1320?

YES ☐ NO ☐

11. IF A MAJOR RULE, IS THERE A REGULATORY IMPACT ANALYSIS ATTACHED?

1. YES ☐ 2. NO ☐ — IF NO, DID OMB WAIVE THE ANALYSIS?

3. YES ☐ 4. NO ☐

12. DOES THIS REGULATION AFFECT ANY TRADE SENSITIVE ACTIVITY?

YES ☐ NO ☐

CERTIFICATION FOR REGULATORY SUBMISSIONS: IN SUBMITTING THIS REQUEST FOR OMB REVIEW, THE AUTHORIZED REGULATORY CONTACT AND THE PROGRAM OFFICIAL CERTIFY THAT THE REQUIREMENTS OF E.O. 12291 AND ANY APPLICABLE POLICY DIRECTIVES HAVE BEEN COMPLIED WITH.

SIGNATURE OF PROGRAM OFFICIAL	DATE	SIGNATURE OF AUTHORIZED REGULATORY CONTACT	D. TE
		10/2	

PART III. COMPLETE THIS PART ONLY IF THE REQUEST IS FOR APPROVAL OF A COLLECT... INFORMATION UNDER THE PAPERWORK REDUCTION ACT AND 5 CFR 1320.

23. ABSTRACT - DESCRIBE NEEDS, USES AND AFFECTED PUBLIC IN 50 WORDS OR LESS

B239 10 Project information supplied by manufacturers is used to verify that test requirements have been satisfied. Test results are reviewed to determine if emission standards have been met and to establish fuel economy values. -6-

14. TYPE OF INFORMATION COLLECTION (CHECK ONE ONLY)

INFORMATION COLLECTIONS NOT CONTAINED IN RULES
- ☐ 1. REGULAR SUBMISSION
- ☐ 2. EMERGENCY SUBMISSION (CERTIFICATION ATTACHED)

INFORMATION COLLECTIONS CONTAINED IN RULES
- ☐ 3. EXISTING REGULATION (NO CHANGE PROPOSED)
- ☒ 4. NOTICE OF PROPOSED RULEMAKING (NPRM)
- ☐ 5. FINAL, NPRM WAS PREVIOUSLY PUBLISHED
- ☐ 6. FINAL OR INTERIM FINAL WITHOUT PRIOR NPRM
  - ☐ A. REGULAR SUBMISSION
  - ☐ B. EMERGENCY SUBMISSION (CERTIFICATION ATTACHED)

DATE OF EXPECTED OR ACTUAL FEDERAL REGISTER PUBLICATION AT THIS STAGE OF RULEMAKING — June 7, 1983

15. TYPE OF REVIEW REQUESTED (CHECK ONE ONLY)
- ☐ 1. NEW COLLECTION
- ☒ 2. REVISION OF A CURRENTLY APPROVED COLLECTION
- ☐ 3. EXTENSION OF THE EXPIRATION DATE OF A CURRENTLY APPROVED COLLECTION WITHOUT ANY CHANGE IN THE SUBSTANCE OR IN THE METHOD OF COLLECTION
- ☐ 4. REINSTATEMENT OF A PREVIOUSLY APPROVED COLLECTION FOR WHICH APPROVAL HAS EXPIRED
- ☐ 5. EXISTING COLLECTION IN USE WITHOUT AN OMB CONTROL NUMBER

16. AGENCY REPORT FORM NUMBER(S)

17. ANNUAL REPORTING OR DISCLOSURE BURDEN

1. NUMBER OF RESPONDENTS	See
2. NUMBER OF RESPONSES PER RESPONDENT	Attached
3. TOTAL ANNUAL RESPONSES (1 x 2)	Report
4. HOURS PER RESPONSE	
5. TOTAL HOURS (3 x 4)	

18. ANNUAL RECORDKEEPING BURDEN

1. NUMBER OF RECORDKEEPERS	See
2. ANNUAL HOURS PER RECORDKEEPER	Attached
3. TOTAL RECORDKEEPING HOURS (1 x 2)	Report
4. RECORDKEEPING RETENTION PERIOD	___ YEARS

19. TOTAL ANNUAL BURDEN

1. REQUESTED (17-5 + 18-3)	1,645,212
2. IN CURRENT OMB INVENTORY	1,650,000
3. DIFFERENCE (1 - 2)	±
EXPLANATION OF DIFFERENCE	
4. PROGRAM CHANGE	± -4,788
5. ADJUSTMENT	±

20. CURRENT (MOST RECENT) OMB CONTROL NUMBER OR COMMENT NUMBER

2000-0390

21. REQUESTED EXPIRATION DATE

5/31/85

22. PURPOSE OF INFORMATION COLLECTION (CHECK AS MANY AS APPLY)
- ☐ 1. APPLICATION FOR BENEFITS
- ☐ 2. PROGRAM EVALUATION
- ☐ 3. GENERAL PURPOSE STATISTICS
- ☒ 4. REGULATORY OR COMPLIANCE
- ☐ 5. PROGRAM PLANNING OR MANAGEMENT
- ☐ 6. RESEARCH
- ☐ 7. AUDIT

23. FREQUENCY OF RECORDKEEPING OR REPORTING (CHECK ALL THAT APPLY)
- ☐ 1. RECORDKEEPING
- REPORTING
  - ☐ 2. ON OCCASION
  - ☐ 3. WEEKLY
  - ☐ 4. MONTHLY
  - ☐ 5. QUARTERLY
  - ☐ 6. SEMI-ANNUALLY
  - ☒ 7. ANNUALLY
  - ☐ 8. BIENNUALLY
  - ☐ 9. OTHER -DESCRIBE

24. RESPONDENTS OBLIGATION TO COMPLY (CHECK THE STRONGEST OBLIGATION THAT APPLIES)
- ☐ 1. VOLUNTARY
- ☒ 2. REQUIRED TO OBTAIN OR RETAIN A BENEFIT
- ☐ 3. MANDATORY

25. ARE THE RESPONDENTS PRIMARILY EDUCATIONAL AGENCIES OR INSTITUTIONS OR IS THE PRIMARY PURPOSE OF THE COLLECTION RELATED TO FEDERAL EDUCATION PROGRAMS?

YES ☐ NO ☒

26. DOES THE AGENCY USE SAMPLING TO SELECT RESPONDENTS OR DOES THE AGENCY RECOMMEND OR PRESCRIBE THE USE OF SAMPLING OR STATISTICAL ANALYSIS BY RESPONDENTS?

YES ☐ NO ☒

27. REGULATORY AUTHORITY FOR THE INFORMATION COLLECTION

40 CFR Parts 86 & 600, or

____ FR ____, or

OTHER (SPECIFY) ____

PAPERWORK CERTIFICATION: IN SUBMITTING THIS REQUEST FOR OMB APPROVAL, THE AGENCY HEAD, THE SENIOR OFFICIAL OR AN AUTHORIZED REPRESENTATIVE, CERTIFIES THAT THE REQUIREMENTS OF THE PRIVACY ACT AND OMB DIRECTIVES HAVE BEEN COMPLIED WITH INCLUDING PAPERWORK REGULATIONS, STATISTICAL STANDARDS OR DIRECTIVES, AND ANY OTHER INFORMATION POLICY DIRECTIVES PROMULGATED UNDER THE PAPERWORK REDUCTION ACT OF 1980.

SIGNATURE OF PROGRAM OFFICIAL — DATE

SIGNATURE OF AGENCY HEAD OR THE SENIOR OFFICIAL OR AN AUTHORIZED REPRESENTATIVE — DATE

Reproduced from best available copy.

7 14 2